# EXHIBIT E

Declaration of Omar Gonzalez-Pagan in support of Motion to Exclude Expert Testimony of Dr. Paul R. McHugh *Kadel v. Folwell*, No. 1:19-cv-00272-LCB-LPA (M.D.N.C.)

## HA40.Y Other specified aetiological considerations in sexual dysfunctions and sexual pain disorders

### Gender incongruence (BlockL1-HA6)

Gender incongruence is characterised by a marked and persistent incongruence between an individual's experienced gender and the assigned sex. Gender variant behaviour and preferences alone are not a basis for assigning the diagnoses in this group.

**Exclusions:** Paraphilic disorders (BlockL1-6D3)

#### HA60 Gender incongruence of adolescence or adulthood

Gender Incongruence of Adolescence and Adulthood is characterised by a marked and persistent incongruence between an individual's experienced gender and the assigned sex, which often leads to a desire to 'transition', in order to live and be accepted as a person of the experienced gender, through hormonal treatment, surgery or other health care services to make the individual's body align, as much as desired and to the extent possible, with the experienced gender. The diagnosis cannot be assigned prior the onset of puberty. Gender variant behaviour and preferences alone are not a basis for assigning the diagnosis.

**Exclusions:** Paraphilic disorders (BlockL1-6D3)

#### HA61 Gender incongruence of childhood

Gender incongruence of childhood is characterised by a marked incongruence between an individual's experienced/expressed gender and the assigned sex in prepubertal children. It includes a strong desire to be a different gender than the assigned sex; a strong dislike on the child's part of his or her sexual anatomy or anticipated secondary sex characteristics and/or a strong desire for the primary and/or anticipated secondary sex characteristics that match the experienced gender; and make-believe or fantasy play, toys, games, or activities and playmates that are typical of the experienced gender rather than the assigned sex. The incongruence must have persisted for about 2 years. Gender variant behaviour and preferences alone are not a basis for assigning the diagnosis.

**Exclusions:** Paraphilic disorders (BlockL1-6D3)

HA6Z Gender incongruence, unspecified

HA8Y Other specified conditions related to sexual health

HA8Z Conditions related to sexual health, unspecified

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